

NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. : JANUARY 5, 2022

NO. X06-UWY-CV-18-6046437-S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. : JANUARY 5, 2022

NO. X06-UWY-CV-18-6046438-S : SUPERIOR COURT
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PLAINTIFFS' MOTION CONCERNING SUBPOENA TO FACEBOOK, INC.

On December 14, 2021, the Court entered an order authorizing the plaintiffs to commission a competent authority in California for the purpose of issuing a subpoena to Facebook, Inc. ("Facebook"). *See* DN 548.10. On that same date, the Court entered an order authorizing the plaintiffs to "attach to their subpoenas to the social media providers this court order requiring Facebook, Inc. . . . to produce the social media data and analytics requested in the subpoenas duces tecum attached to the motions for commission, which were granted by this court." DN 550.10. In advance of the issuance of the subpoena, Facebook has conveyed its preference that the subpoena

include a request for subscriber information¹ for the relevant social media accounts to insure that its production pertains only to those accounts that are associated with the Jones defendants. In order to ensure Facebook's complete and efficient compliance with the plaintiffs' subpoena, the plaintiffs intend to include the following request in their subpoena.

Any and all subscriber information for each of the Relevant Facebook Accounts and the Relevant Instagram Accounts. For ease of reference, the URLs associated with each Relevant Facebook Account are as follows:

Relevant Facebook Account	URL
Alex Jones	facebook.com/AlexanderEmerickJones
InfoWars	facebook.com/InfoWars or facebook.com/InfoWarsReporters
Infowars Health	facebook.com/AlexJonesInfowarsHealth
Infowars Magazine	facebook.com/infowarsmagazine
Infowars Nightly News	facebook.com/infowarsnightlynewsnetwork
Infowars Store	facebook.com/InfowarsStore
NewsWars	facebook.com/NewsWars
Paul Joseph Watson	facebook.com/PaulJosephWatson
Planet Infowars	facebook.com/PlanetInfoWars
Prison Planet.TV	facebook.com/PrisonPlanet.TV
RealNews with David Knight	facebook.com/realnews or facebook.com/realnewsX2
The Alex Jones Channel	facebook.com/TheAlexJonesChannel
The Infowar Mega-Feed	facebook.com/TheInfoWarMega-Feed
WarRoom	facebook.com/WarRoomShow

The plaintiffs notify the Court of this additional request for production because it was not included in the proposed subpoena that the plaintiffs initially submitted for the Court's review. *See*

¹ Subscriber information means any information held by a service provider, relating to subscribers of its services, other than traffic data or content data, and by which can be established: (i) the type of communication service used, the technical provisions thereof, and the period of service; (ii) the subscriber's identity, mail address, telephone and other access number, billing and payment information, and/or (iii) any information regarding the location of installed communications equipment.

DN 552.00. At that time, Facebook had not requested that the plaintiffs' subpoena include a request for subscriber information. The request for subscriber information does not expand or alter any request for content and/or analytics data that this Court has already approved. Although the plaintiffs believe that such a request is encompassed by this Court's prior orders, out of an abundance of caution and in response to Facebook's guidance, the plaintiffs move for leave to include this request for subscriber information in the subpoena directed to Facebook. A redline version of the subpoena the plaintiffs intend to issue and serve on Facebook is attached hereto at Ex. A.

A request for expedited adjudication accompanies this motion.

THE PLAINTIFFS

By: /s/ Christopher M. Mattei
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CERTIFICATION

This is to certify that a copy of the foregoing has been emailed and/or mailed, this day, postage prepaid, to all counsel and *pro se* appearances as follows:

For Alex Emric Jones, Infowars, LLC, Free Speech Systems, LLC, Infowars Health, LLC and Prison Planet TV, LLC:

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/s/ Christopher M. Mattei
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EXHIBIT A

PLEASE CONTACT THE UNDERSIGNED TO CONFIRM APPEARANCE

**TO: FACEBOOK, INC.
1 Hacker Way
Menlo Park, CA 94025**

SUBPOENA AD TESTIFICANDUM

BY THE AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to designate a person or persons, who can testify concerning the documents and data requested in the attached Schedule A and their provenance, to appear and be deposed, on a date and time to be determined, at the offices of U.S. Legal Support, 201 Mission Street, Suite 600, San Francisco, CA 94105, **or otherwise via remote videoconference**, in a certain Civil Action pending in the Connecticut Superior Court between:

ERICA LAFFERTY, ET AL.

Plaintiff

and

DOCKET NO: X06-UWY-CV-18-6046436S

ALEX EMRIC JONES, ET AL.


Defendant

AND consolidated matters. At the same time and place, you are further commanded to bring with you and produce the following: **See attached Schedule A for requests for production.**

HEREOF FAIL NOT, UNDER PENALTY OF THE LAW

To any proper officer or indifferent person to serve and return.

Dated at Bridgeport, Connecticut on November 3rd, 2021.



CHRISTOPHER M. MATTEI
Commissioner of the Superior Court

Schedule A

Definitions

Please be advised that these Requests for Production use and incorporate the definitions set forth in Conn. Practice Book § 13-1.

Unless otherwise specified, the time frame for these discovery requests is **December 14, 2012 to the present day**.

For the purposes of these Requests for Production only:

“Mass Casualty Event” is defined as: Any mass shooting or human-caused mass casualty event including:

- a. the Sandy Hook shooting
- b. the 2012 Aurora, Colorado shooting
- c. the 2013 Boston Marathon bombing
- d. the 2013 Washington Navy Yard shooting
- e. the 2015 San Bernardino attack
- f. the 2015 Charleston church shooting
- g. the 2016 Orlando nightclub shooting
- h. the 2017 Las Vegas shooting
- i. the 2017 Sutherland Springs church shooting
- j. the 2018 Parkland, Florida shooting
- k. the 2018 Thousand Oaks, California shooting
- l. the 2018 Pittsburgh synagogue shooting
- m. the 2018 Santa Fe high school shooting

“Non-Governmental Investigation” is defined as: Any and all purported inquiries into the facts and circumstances surrounding the Sandy Hook Shooting conducted by persons or entities that are not governmental agents or entities.

“Relevant Facebook Accounts” are defined as: User or business accounts, profiles, or pages on Facebook.com under the following names:

- a. Alex Jones
- b. InfoWars
- c. Infowars Health
- d. Infowars Magazine
- e. Infowars Nightly News
- f. Infowars Store
- g. NewsWars
- h. Paul Joseph Watson

Schedule A

- i. Planet Infowars
- j. Prison Planet.TV
- k. RealNews with David Knight
- l. The Alex Jones Channel
- m. The Infowar Mega-Feed
- n. WarRoom

“Relevant Instagram Accounts” are defined as: User or business accounts, profiles, or pages on Instagram.com under the following names:

- a. Alex Jones @real_alexjones
- b. infowarslife @infowarslife
- c. Infowars @infowars_crew

“Sandy Hook Family” is defined as: references to any nuclear family member (including step-family members) of someone who was shot and/or killed at Sandy Hook Elementary School on December 14, 2012, or references to “parent(s)” and/or “family(ies)” of those victims in general.

“Sandy Hook First Responders” are defined as: Medical and law enforcement personnel who responded to the Sandy Hook Shooting.

“Sandy Hook Investigation” is defined as: The investigation conducted by Connecticut local and state governmental bodies and federal law enforcement authorities concerning the Sandy Hook Shooting, including any conclusions and/or findings of that investigation.

“Sandy Hook Hoax Theory” is defined as: Any theory that the Sandy Hook Shooting did not happen as is generally accepted, including that it was a government conspiracy, scripted, included so-called “crisis actors,” that the Sandy Hook Victims did not die, and bases for such theories.

“Sandy Hook Shooting” is defined as: The shooting that took place at Sandy Hook Elementary School in the town of Newtown, Connecticut on December 14, 2012.

“Sandy Hook Victim” is defined as: A person who was shot and/or killed in the shooting that took place at Sandy Hook Elementary School in Newtown, CT, on December 14, 2012.

“This Lawsuit” is defined as: *Erica Lafferty, et al v. Alex Emric Jones, et al*, Dkt. No. UWY-CV18-6046436-S, *William Sherlach v. Alex Jones, et al*, Dkt. No. UWY-CV18-6046437-S, and *William Sherlach, et al v. Alex Emric Jones, et al*, Dkt. No. UWY-CV18-6046438-S.

Schedule A

“The Plaintiffs in This Lawsuit” are defined as:

- a. David Wheeler
- b. Francine Wheeler
- c. Jacqueline Barden
- d. Mark Barden
- e. Nicole Hockley
- f. Ian Hockley
- g. Jennifer Hensel
- h. Jeremy Richman
- i. Donna Soto
- j. Carlee Soto Parisi
- k. Carlos Soto
- l. Jillian Soto-Marino
- m. William Aldenberg
- n. Erica Garbatini a/k/a Erica Lafferty
- o. Robert Parker
- p. William Sherlach

“The Texas Lawsuits” are defined as: *Neil Heslin v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001835; *Leonard Pozner and Veronique de la Rosa v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001842; *Scarlett Lewis v. Alex E. Jones, et al*, Cause No. D-1-GN-18-006623, *Marcel Fontaine v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001605; *Brennan M. Gilmore v. Alexander E. Jones, et al.*, Case No. 18-00017 (D. W.Va.).

Schedule A

1. The number of followers, likes, and friends for each Relevant Facebook Account and each Relevant Instagram Account at the time that the account was suspended or “de-platformed” in or around August 2018.
2. Metadata and contents of all posts, status updates, stories, Facebook Live videos, Instagram Live videos, articles, videos, GIFs, polls, public messages, or other communications; created, shared, or re-shared by the Relevant Facebook Accounts or Relevant Instagram Accounts; concerning any of the following topics:
 - a. Sandy Hook
 - b. Newtown
 - c. Sandy Hook Shooting
 - d. Sandy Hook Investigation
 - e. Non-Governmental Investigation
 - f. Adam Lanza
 - g. Mass casualty events
 - h. Sandy Hook Victims, or any specific Sandy Hook Victim
 - i. Sandy Hook Family, or any specific Sandy Hook Family member
 - j. Crisis actors or actors in statements concerning a tragic event
 - k. The plaintiffs in this lawsuit, or any specific plaintiff in this lawsuit
 - l. This Lawsuit
 - m. The Texas Lawsuits
 - n. Wolfgang Halbig
 - o. Steve Pieczenik
 - p. Eddie Bravo
 - q. James Fetzer
 - r. James Tracy
3. All engagement information for each post, status update, story, Facebook Live video, Instagram Live video, article, video, GIF, poll, message, or other communication responsive to request 2 above, including: impressions, views, previews, clicks, reactions, likes, favorites, shares, mentions, comments, recommendations, and saves.
4. All advertisements, promotions, post boosts, or other paid communications created or paid for by the Relevant Facebook Accounts or Relevant Instagram Accounts.
5. For the advertisements, promotions, post boosts, or other paid communications responsive to request 4 above: information on the audience targeted; the budget selected; the amount spent by the account to purchase and maintain the advertisement, promotion, or post boost; and performance data.
6. All engagement information on any advertisements, promotions, post boosts, or other paid communications responsive to request 4 above, including impressions, views, previews,

Schedule A

clicks, reactions, likes, favorites, shares, mentions, comments, recommendations, and saves.

7. Revenue received by each Relevant Facebook Account and Relevant Instagram Account for any monetization activity, hosted advertisement, or sale of goods on or through Facebook or Instagram.
8. Any and all subscriber information for each of the Relevant Facebook Accounts and the Relevant Instagram Accounts. For ease of reference, the URLs associated with each Relevant Facebook Account are as follows:

Relevant Facebook Account	URL
Alex Jones	facebook.com/AlexanderEmerickJones
InfoWars	facebook.com/InfoWars or facebook.com/InfoWarsReporters
Infowars Health	facebook.com/AlexJonesInfowarsHealth
Infowars Magazine	facebook.com/infowarsmagazine
Infowars Nightly News	facebook.com/infowarsnightlynewsnetwork
Infowars Store	facebook.com/InfowarsStore
NewsWars	facebook.com/NewsWars
Paul Joseph Watson	facebook.com/PaulJosephWatson
Planet Infowars	facebook.com/PlanetInfoWars
Prison Planet.TV	facebook.com/PrisonPlanet.TV
RealNews with David Knight	facebook.com/realnews or facebook.com/realnewsX2
The Alex Jones Channel	facebook.com/TheAlexJonesChannel
The Infowar Mega-Feed	facebook.com/TheInfoWarMega-Feed
WarRoom	facebook.com/WarRoomShow